

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC.;
ANYTHING GOES LLC d/b/a MAIL
BOXES ETC., and JCK INDUSTRIES,
INC., on behalf of themselves and all
others similarly situated,

Plaintiffs,
v.

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., *et al.*,

Defendants.

Case No.: 08-CV-00042 (BMC) (PK)

**NOTICE OF MOTION AND JOINT
MOTION FOR INDICATIVE RULING
APPROVING SETTLEMENT WITH
CLAIMANT CHINESE CHAMBER OF
INTERNATIONAL COMMERCE**

TO THE COURT AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Co-Lead Counsel for the Class of purchasers of Freight Forwarding Services (“Class Counsel”) and claimant Chinese Chamber of International Commerce (“CCOIC”), will move this court before the Honorable Brian M. Cogan, United States District Court Judge, in Courtroom 8D in the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201 with a return date of February 24, 2020 at 9:30am, regarding the Parties’ Joint Motion, pursuant to Federal Rules of Civil Procedure 62.1 and 23(E)(5)(b), for an Order granting the request of an indicative ruling approving a settlement between the parties and partial claim award to the CCOIC. The parties do not request oral argument.

Pursuant to Federal Rule of Civil Procedure 62.1, the parties jointly request an indicative ruling that the Court will, upon remand from the Second Circuit, proceed with certain actions necessary to effectuate their settlement and permit distribution of the net settlement fund to the Class.

Class Counsel and the CCOIC have provided a separate proposed order regarding the request above, and respectfully request the Court issue an indicative ruling approving the Settlement between the parties.

Dated: February 20, 2020

Respectfully submitted,

/s/ Joshua J. Rissman

Daniel E. Gustafson

Daniel C. Hedlund

Michelle J. Looby

Joshua J. Rissman

GUSTAFSON GLUEK PLLC

Canadian Pacific Plaza

120 South 6th Street, Suite 2600

Minneapolis, MN 55402

T: (612) 333-8844

F: (612) 339-6622

E-mail: dgustafson@gustafsongluek.com

dhedlund@gustafsongluek.com

mlooby@gustafsongluek.com

jrißman@gustafsongluek.com

W. Joseph Bruckner

Heidi M. Silton

Craig S. Davis

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

T: (612) 339-6900

F: (612) 339-0981

E-mail: wjbruckner@locklaw.com

hsilton@locklaw.com

csdavis@locklaw.com

Christopher Lovell

Benjamin M. Jaccarino

LOVELL STEWART HALEBIAN

JACOBSON LLP

500 5th Avenue, Suite 2440

New York, NY 10110

T: (212) 608-1900

F: (212) 719-4775

E-mail: clovell@lshllp.com
bjaccarino@lshllp.com

Adam J. Zapala
COTCHETT, PITRE & MCCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
T: (650) 697-6000
F: (650) 697-0577
E-mail: azapala@cpmlegal.com

Interim Co-Lead Counsel for Plaintiffs

/s/ Tejinder Singh
Tejinder Singh
GOLDSTEIN & RUSSELL, P.C.
7475 Wisconsin Ave., Suite 850
Bethesda, MD 20814
T: (202) 362-0636
F: (866) 574-2033
E-mail: tsingh@goldsteinrussell.com

Counsel for the CCOIC